

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

Drafted: March 9, 2015

Finalized: March 12, 2015

SUBJECT: CAA Full Compliance Evaluation of Sims Metal Management in Providence, RI

FROM: Abdi Mohamoud, Environmental Engineer, Air Technical Unit *Am 3/12/15*

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit *CMS 3/12/15*

TO: File

I Facility Information

A. Facility Name: Sims Metal Management
 B. Facility Location: 242 Allens Avenue, Providence, RI 02905
 C. Facility Mailing Address: Same
 D. Facility Contacts: Michael Cohen, Shipyard Manager
 (401) 752-2000

F. AFS #:

II Background Information

A. Date of Inspection: January 23, 2015
 B. Weather Conditions: Sunny, 26 degrees Fahrenheit
 C. US EPA Representative(s): Abdi Mohamoud and Steve Rapp
 D. State Representative(s): None
 E. Federally Enforceable Requirements Covered During the Inspection:

Federally Enforceable Air Pollution Control Regulations that might apply:

- 40 CFR Part 82, Subpart F;
- 40 CFR Part 63, Subpart II.

State Regulations (Federally Enforceable)

Rhode Island Air Pollution Control Regulations as applicable.

F. Previous Enforcement Actions: This facility was previously owned by Promet Marine and was the subject of an EPA enforcement action in 2010 for violations of 40 CFR Part 63, Subpart II, National Emissions Standards for Hazardous Air Pollutants from Shipbuilding and

Repair as well as Rhode Island's Regulation 9.

III Purpose of Inspection

The purpose of this inspection was to evaluate the facility's compliance with applicable Clean Air Act regulations.

IV Facility Description

A. Company/Facility History:

At the Allens Avenue address, Sims Metal Management (SIMS) owns a metal recycling and boat painting facility. The metals at this facility are processed (e.g., shredded) at other SIMS facilities and brought to this location for shipment via boat. The facility is located in a port terminal. The company bought this facility from Promet Marine in 2011.

B. Contact Name and Mailing Address:

Scott Jacobs, Safety and Environmental Manager, is the contact person for this facility. The mailing address for Mr. Jacobs is 242 Allens Avenue, Providence, RI, 02905.

C. Working Hours:

The facility operates one shift a day, five and half days per week, 52 weeks per year. This shift is typically eight hours per day from 7 am to 4 pm.

D. Process Description:

The facility collects ferrous and non-ferrous metals from other SIMS' facilities. Materials processed at other facilities, such as the Sims shredding facility in Johnston, RI, are trucked to the site, stored in piles outdoors, and then transported by truck onto ships moored at the site. The scrap metals are sold to end-users, such as manufacturers, mills, foundries, secondary smelters, and metal brokers. In addition, there is a painting operation for commercial and pleasure boats at this location. See photos in electronic file.

V Inspection

A. Entry:

EPA inspectors, Steve Rapp and Abdi Mohamoud, arrived at the SIMS facility at 9:30 am. When the inspectors entered, they parked their vehicle inside the SIMS facility fence-line and observed the operation from the parking lot. The inspectors' line of sight to the facility was not obstructed by any trees, building, or fences and it was a sunny day. From this location, the inspectors did not see any smoke emanating from the facility. The inspectors were met by facility representative Michael Cohen, Shipyard Manager. The inspectors showed their credentials to Mr. Cohen.

B. Opening Conference and Walkthrough:

Mr. Mohamoud indicated that the purpose of EPA inspectors' visit was to conduct a CAA inspection to evaluate SIMS' compliance with any applicable federal air pollution regulations. Mr. Mohamoud explained that SIMS may be subject to 40 CFR Part 82, Subpart F (a federal standard that establishes requirements for the service, maintenance, repair and disposal of appliances containing ozone-depleting substances, such as refrigerant), as well as Rhode Island Air Pollution Control Regulations, such as those concerning metal cleaning or degreasing.

Mr. Mohamoud asked Mr. Cohen if SIMS handles equipment that contained ozone depleting substances (ODS), such as refrigerants, and if so, did SIMS use its own equipment or a contractor to evacuate the ODS. Mr. Cohen said that SIMS does not receive white good at this location and all metals that brought to this facility are already processed in other facilities that belong to SIMS. The inspectors asked if the facility had a maintenance garage for its vehicles and if so, if it had a solvent based parts-washer. Mr. Cohen said that there is no maintenance garage and no parts washer at this location.

When Mr. Mohamoud asked if there was painting operation at the facility, Mr. Cohen said that there was a painting operation for the boats that SIMS repairs. Mr. Cohen is the shipyard Manager who oversees the painting operation. He took the EPA inspectors to the shipyard portion of the facility where employees were repairing several commercial boats, such as commercial fishing vessels. The inspectors asked to see the painting operation. Mr. Cohen then opened a shed in the shipyard and showed the inspectors two spray guns and compressor equipment that he said was used to paint the boats. The inspectors smelled a strong solvent odor in the shed and took several picture of the inside.

The inspectors observed the scrap metal area of the facility through the fence between the shipyard and the scrap metal yard. The inspectors observed a number of trucks (e.g., eighteen wheelers) loaded with shredded scrap metal entering the facility through a weigh station. The trucks then dumped their loads onto the ground of the scrap yard side of the facility. The inspectors observed cranes and front end loading equipment moving scrap metal from piles onto large dump trucks. The dump trucks were then queuing up to dump the material onto a large vessel (approximately 300 feet long) that was tied up at the dock of the facility.

The inspectors took several pictures which are located in the electronic file.

C. Record Review:

During the inspection, the inspectors were not given any records to review.

D. Closing Conference:

At the closing conference, the EPA inspectors thanked Mr. Cohen for his time and assistance and departed the site.